

# **EXHIBIT 4**

**Deborah Knowlton**

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**From:** Philip Barden <Philip.Barden@devonshires.co.uk>  
**Sent:** Wednesday, July 13, 2016 4:16 PM  
**To:** Meredith Schultz  
**Cc:** Sigrid McCawley; 'brad@pathtojustice.com' (brad@pathtojustice.com); Paul Cassell (cassellp@law.utah.edu); Sandra Perkins; Aneisha Christie; Laura Menninger (lmenninger@hmflaw.com); jpagliuca@hmflaw.com  
**Subject:** Re: Acceptance of Service of Process

Dear Madam

Please answer my earlier email and provide the documents required to evidence that you have complied with The Hague Convention and UK law.

Absent this your process is invalid as I am sure you know.

It looks like you have issued a subpoena in the US and sought to serve that here without compliance with international and UK law.

Regards

Philip Barden

Sent from my iPhone

On 13 Jul 2016, at 18:09, Meredith Schultz <mschultz@BSFLLP.com<mailto:mschultz@bsflp.com>> wrote:

Dear Mr. Barden,

You are in receipt of a valid subpoena, though I understand that you contest that service has been properly effectuated. Despite this opinion, my London office has informed me that, pursuant to English law, Mr. Gow may waive service of process by giving you permission to accept the subpoena on his behalf. Please advise at your earliest convenience whether you accept service of process of the subpoena on behalf of Mr. Gow. In addition, I would be happy to work with Mr. Gow's schedule to find a day that is mutually convenient for the deposition.

Thanks,

Meredith

Meredith L. Schultz  
BOIES, SCHILLER & FLEXNER LLP  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301  
Phone: 954-356-0011 ext. 4204  
Fax: 954-356-0022

<http://www.bsflfp.com><<https://fttmail.bsflfp.com/exchweb/bin/redirect.asp?URL=http://www.bsflfp.com>>

From: Philip Barden [mailto:Philip.Barden@devonshires.co.uk]

Sent: Wednesday, July 13, 2016 1:13 AM

To: Meredith Schultz

Cc: Sigrid McCawley; 'brad@pathtojustice.com'<mailto:brad@pathtojustice.com>

(brad@pathtojustice.com<mailto:brad@pathtojustice.com>); Paul Cassell

(cassellp@law.utah.edu<mailto:cassellp@law.utah.edu>); Sandra Perkins; Aneisha Christie; Laura Menninger

(lmessenger@hmflaw.com<mailto:lmessenger@hmflaw.com>);

jpgagliuca@hmflaw.com<mailto:jpgagliuca@hmflaw.com>

Subject: Re: Acceptance of Service of Process

Dear Ms Schultz

Would you please provide me with the Letter of Request, enabling England & Wales High Court order with supporting documents and I will take instructions.

I see no evidence that you have followed the correct process in this matter and without compliance with The Hague Convention, as implemented in the UK, there can be no valid service.

Once I can see that you have a valid subpoena then I will ensure Mr Gow is available for service. I cannot be served in his place as that is not valid service.

You will appreciate many people are away on holiday now.

Further service has to be effected no less than 7 days before any hearing (subject to challenge) and so 20 July is not a valid date.

I would add that the subpoena I have seen does not comply with UK laws and so if issued in this form will be challenged and that challenge must be determined before any deposition.

These matters are usually dealt with in the first instance by inter lawyer correspondence and so I await your reply.

Regards

Philip Barden

Sent from my iPhone

On 12 Jul 2016, at 23:02, Meredith Schultz

<mschultz@BSFLLP.com<mailto:mschultz@bsflfp.com<mailto:mschultz@BSFLLP.com%3cmailto:mschultz@bsflfp.com>>>> wrote:

Dear Mr. Barden,

Please see the attached correspondence on behalf of Sigrid McCawley.

Sincerely,

Meredith Schultz

Meredith L. Schultz  
BOIES, SCHILLER & FLEXNER LLP  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301  
Phone: 954-356-0011 ext. 4204  
Fax: 954-356-0022

<http://www.bsfllp.com><<http://www.bsfllp.com>>><<https://fttmail.bsfllp.com/exchweb/bin/redir.asp?URL=http://www.bsfllp.com>>>  
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<2016-07-12 Letter to Barden enclosing Subpoena.pdf>

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